



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUSSAM SHAIB,
aka "Husam Shaib,"
aka "Husam Chaaib," and
SAID MNEIMNE,
aka "Aref Charrak,"

Defendants.

CR 2:22-cr-00364-DSF

I N D I C T M E N T

[22 U.S.C. § 2778(b)(2), (c); 22 C.F.R. §§ 121.1, 123.1, 127.1(a)(4), 127.1(e): Conspiracy to Violate the Arms Export Control Act; 50 U.S.C. § 4819(a), (b); 15 C.F.R. §§ 736.2 and 764.2, and parts 738 and 742: Conspiracy to Violate the Export Administration Regulations and Attempted Export of Commerce Control List Items; 18 U.S.C. § 1956(a)(2)(A), (h): Conspiracy to Commit International Promotional Money Laundering; 18 U.S.C. § 371: Conspiracy]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

A. DEFENDANTS AND RELEVANT ENTITIES

1. Defendant HUSSAM SHAIB, also known as ("aka") "Husam Shaib," aka "Husam Chaaib" ("SHAIB"), was a citizen of Lebanon, who resided in Beirut, Lebanon.

1 2. Defendant SAID MNEIMNE, aka "Aref Charrak" ("MNEIMNE"), was
2 a citizen of the United States, and resided in an apartment in Los
3 Angeles, California ("MNEIMNE's residence").

4 3. The Sherman Oaks address was a separate residential address
5 located in Sherman Oaks, California.

6 4. The Tujunga address was also a residential address located
7 in Tujunga, California.

8 5. The Van Nuys shipping location was a business in Van Nuys,
9 California that assisted individuals who shipped packages to
10 international locations, including to Lebanon.

11 6. Lebanese Company #1 was a company located in Beirut,
12 Lebanon, that held itself out as a hair salon.

13 7. U.S. Company #1 through U.S. Company #14 (collectively, the
14 "U.S. Companies"), were all companies located in the United States
15 that sold firearm components online to customers located in the
16 United States, including to defendant MNEIMNE.

17 B. LAWS RESTRICTING THE EXPORT OF DEFENSE ARTICLES

18 8. The Arms Export Control Act, Title 22, United States Code,
19 Section 2778 ("AECA"), authorized the President of the United States
20 to control the export of "defense articles" by designating certain
21 items as defense articles and promulgating regulations for the import
22 and export of such articles.

23 9. The AECA and the International Traffic in Arms Regulations,
24 Title 22, Code of Federal Regulations, Parts 120-130 ("ITAR")
25 required a person to register with the Department of State's
26 Directorate of Defense Trade Controls ("DDTC") and obtain a DDTC
27 license before exporting defense articles, by any means, from the
28 United States. (22 U.S.C. § 2778(b)(2); 22 C.F.R. §§ 120.1, 123.1.)

10. Defense articles that were subject to such licensing requirements were designated on the United States Munitions List ("USML"), as set forth in Part 121.1 of the ITAR. Those designations were made by the United States Department of State ("Department of State") with the concurrence of the United States Department of Defense ("Department of Defense"). (22 U.S.C. § 2778(a)(1); 22 C.F.R. § 120.2.)

11. Between March 1, 2019 and February 28, 2020, the defense articles at issue ("the Defense Articles") were defense articles as defined by Category I(g) and I(h) of the USML.

12. Between March 1, 2019 and February 28, 2020, the following items were defense articles as defined by Category I(g) of the USML:

<u>Item Number</u>	<u>Item Name</u>
1	7.5" 5.56 NATO 1:7 pistol length AR-15 barrel
2	ELD Performance Match Grade 9mm Glock 19 compatible nitride melonite 1-16T threaded barrel
3	KAK VALUE LINE 5.56 4.75" melonite barrel
4	U.S. Company #1 barrel fits Glock 17 New 9mm Match Grade barrel threaded
5	U.S. Company #1 barrel fits Glock 19 New 9mm Match Grade barrel threaded
6	U.S. Company #1 gas blocks .750 low profile steel
7	U.S. Company #2 4.75" 5.56 NATO SS 1:5 Twist barrel
8	Glock OEM barrel 17, 19 & 34 - Gen 1-4
9	Killer Innovations CZP10C Threaded Velocity barrel
10	Bear Creek Arsenal 10.5", 5.56 NATO Parkerized 4150 carbine barrel

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13. Between March 1, 2019 and February 28, 2020, the following items were defense articles as defined by Category I(h) of the USML:

<u>Item Number</u>	<u>Item Name</u>
1	80% P320 compatible insert - MUP 1
2	Bear Creek Arsenal stainless steel threaded barrel for a Glock 17
3	Bear Creek Arsenal stainless steel threaded barrel for a Glock 19
4	Glock Factory customizable frame parts kit for a Glock 19 Gen 3 9mm Luger
5	Glock Factory slide parts kit for a Glock Gen 3 9mm Luger
6	Glock Factory slide parts kit for a Glock 17 Gen 3 9mm Luger
7	Glock OEM slide parts kit for a Gen 3 9mm
8	HK MP5 3 Position 0, 1, F Navy Housing, Push Pin Housing
9	Polymer80 - PF940C pistol frame kit
10	Recoil Technologies AR-15 5.56/.223/.300/.350 complete bolt carrier group
11	SAA AR-15/M16 - BCG MPI Nitride, .223/5.56/300AAC complete bolt carrier group
12	Sig Sauer P320 lower parts kit
13	U.S. Company #1 mil-spec lower receiver parts kits
14	U.S. Company #1 thread protector 1/2 x 28 (9mm & .357 SIG barrels) steel black
15	Glock OEM lower parts kit for 19/23/32 Fits PF940C
16	ELD Performance Alpha Series AR-15 7.5", Pistol Gas, 5.56 NATO, 1-7T Nitride Barrel
17	United Defense AR-15 5.56/.223 Complete Bolt Carrier Group
18	U.S. Company #1 AR-15 .223/.223 Wylde/300acc blackout/5.5
19	Precision Defense 5.56 Complete M16 bolt carrier group - nitride

14. At no time did defendants SHAIB and MNEIMNE, or any co-conspirators known to the Grand Jury, apply for, receive, or possess

1 a license to export or broker the export of defense articles from the
2 United States.

3 C. The Export Control Reform Act of 2018

4 15. The Export Control Reform Act of 2018 ("ECRA") provides,
5 among its stated policy objectives, that "the national security and
6 foreign policy of the United States require that the export,
7 reexport, and in-country transfer of items, and specific activities
8 of United States persons, wherever located, be controlled"

9 (50 U.S.C. § 4811.) To that end, ECRA grants the President the
10 authority "(1) to control the export, reexport, and in-country
11 transfer of items subject to the jurisdiction of the United States,
12 whether by United States persons or by foreign persons; and (2) the
13 activities of United States persons, wherever located, relating to"
14 specific categories of items and information. (50 U.S.C. § 4812.)
15 ECRA further grants the Secretary of Commerce the authority to
16 establish the applicable regulatory framework.

17 16. Pursuant to that authority, the Department of Commerce
18 ("DOC") reviews and controls the export of certain items, including
19 goods, software, and technologies, from the United States to foreign
20 countries through the Export Administration Regulations ("EAR"). (15
21 C.F.R. §§ 730-774.) In particular, the EAR restrict the export of
22 items that could make a significant contribution to the military
23 potential of other nations or that could be detrimental to the
24 foreign policy or national security of the United States. The EAR
25 impose licensing and other requirements for items subject to the EAR
26 to be lawfully exported from the United States or lawfully reexported
27 from one foreign destination to another.

17. The most sensitive items subject to EAR controls are identified on the Commerce Control List ("CCL") published at 15 C.F.R. part 774, Supp. No. 1. Items on the CCL are categorized by Export Control Classification Number ("ECCN"), each of which has export control requirements depending on destination, end use, and end user.

18. Between March 9, 2020 and December 31, 2020, the commodities at issue ("the Commodities") were classified by BIS under ECCN 0A501.c, controlled for national security, regional stability, and United Nations embargo reasons, and required a BIS license for export to Lebanon. The Commodities were:

<u>Item Number</u>	<u>Item Name</u>
1	M-16 bolt carrier group: M-16 bolt carrier assembly
2	SAA AR-15/M16 - BCG MPI Nitride, .2233/5.56/300AAC complete bolt carrier group

19. At no time did defendants SHAIB and MNEIMNE, or any co-conspirators known to the Grand Jury, apply for, receive, or possess a license to export the Commodities from the United States.

COUNT ONE

[22 U.S.C. § 2778(b)(2), (c);

22 C.F.R. §§ 121.1, 123.1, 127.1(a)(4), 127.1(e)]

The Grand Jury incorporates Introductory Allegations 1 through 14 as if fully set forth herein.

A. OBJECT OF THE CONSPIRACY

Beginning no later than on or about March 20, 2019, and continuing until at least on or about May 2, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendants SHAIB and MNEIMNE, together with others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and willfully export from the United States to Lebanon defense articles that were covered by the USML without first obtaining from the Department of State a valid license or other approval for such export, in violation of 22 U.S.C. § 2778(b)(2) and 22 C.F.R. §§ 121.1, 123.1, 127.1(a)(4).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendant SHAIB would direct defendant MNEIMNE to purchase the Defense Articles from the U.S. Companies.

2. Defendant MNEIMNE would purchase the Defense Articles from the U.S. Companies and would direct the sellers to mail the Defense Articles to locations in Los Angeles, California, including MNEIMNE's residence.

3. Defendant MNEIMNE would export the Defense Articles to Lebanon without obtaining the required export licenses.

1 4. Defendant SHAIB caused money to be transferred to defendant
2 MNEIMNE, including via Western Union, to pay for the Defense Articles
3 and to compensate defendant MNEIMNE in exchange for his efforts.

4 C. OVERT ACTS

5 In furtherance of the conspiracy and to accomplish its objects,
6 on or about the following dates, defendants SHAIB and MNEIMNE, and
7 others known and unknown to the Grand Jury, committed various overt
8 acts in Los Angeles County, within the Central District of
9 California, and elsewhere, including, but not limited to, the
10 following:

11 Overt Act No. 1: On March 20, 2019, defendant SHAIB sent
12 defendant MNEIMNE \$950 via Western Union.

13 Overt Act No. 2: On March 21, 2019, defendant MNEIMNE
14 purchased ten 7.5" 5.56 NATO 1:7 pistol length AR-15 barrels and ten
15 U.S. Company #1 mil-spec lower receiver parts kits from U.S. Company
16 #1 and directed U.S. Company #1 to ship the items to MNEIMNE's
17 residence.

18 Overt Act No. 3: On March 29, 2019, defendant SHAIB sent
19 defendant MNEIMNE \$630 via Western Union.

20 Overt Act No. 4: On April 7, 2019, defendant SHAIB sent
21 defendant MNEIMNE \$1350 via Western Union.

22 Overt Act No. 5: On April 9, 2019, defendant MNEIMNE
23 purchased: (1) five 7.5" 5.56 NATO 1:7 pistol length AR-15 barrels;
24 (2) twelve U.S. Company #1 mil-spec lower receiver parts kits; (3)
25 four U.S. Company #1 barrels fits Glock 17 New 9mm Match Grade
26 barrels threaded; (4) one U.S. Company #1 barrel fits Glock 19 New
27 9mm Match Grade barrel threaded; and (5) five U.S. Company #1 thread
28 protectors 1/2 x 28 (9mm & .357 SIG barrels) steel black from U.S.

1 Company #1 and directed U.S. Company #1 to ship the items to
2 MNEIMNE's residence.

3 Overt Act No. 6: On April 18, 2019, defendant MNEIMNE
4 purchased eleven KAK VALUE LINE 5.56 4.75" melonite barrels from U.S.
5 Company #2 and directed U.S. Company #2 to ship the items to
6 MNEIMNE's residence.

7 Overt Act No. 7: On April 18, 2019, defendant MNEIMNE
8 purchased eleven U.S. Company #1 gas blocks .750 low profile steel
9 and directed U.S. Company #1 to ship the items to MNEIMNE's
10 residence.

11 Overt Act No. 8: On May 13, 2019, defendant SHAIB sent
12 defendant MNEIMNE \$230 via Western Union.

13 Overt Act No. 9: On May 18, 2019, defendant MNEIMNE
14 purchased: (1) four U.S. Company #1 barrels fits Glock 17 New 9mm
15 Match Grade barrels threaded; (2) four U.S. Company #1 barrels fits
16 Glock 19 New 9mm Match Grade barrels threaded; and (3) eight U.S.
17 Company #1 thread protectors 1/2 x 28 (9mm & .357 SIG barrels) steel
18 black from U.S. Company #1 and directed U.S. Company #1 to ship the
19 items to MNEIMNE's residence

20 Overt Act No. 10: On May 18, 2019, defendant MNEIMNE purchased
21 one Polymer80 - PF940C pistol frame kit and one Glock OEM lower parts
22 kit for 19/23/32 Fits PF940C from U.S. Company #3 and directed U.S.
23 Company #3 to ship the items to MNEIMNE's residence.

24 Overt Act No. 11: On May 31, 2019, defendant MNEIMNE shipped a
25 package that weighed 8.10 pounds that he claimed contained a "auto
26 parts - BMW keyless push start button, BMW wireless charger" to
27 Beirut, Lebanon.

1 Overt Act No. 12: On July 3, 2019, defendant SHAIB sent
2 defendant MNEIMNE \$130 via Western Union.

3 Overt Act No. 13: On August 7, 2019, defendant SHAIB sent
4 defendant MNEIMNE \$1000 via Western Union.

5 Overt Act No. 14: On August 8, 2019, defendant MNEIMNE
6 purchased four 7.5" 5.56 NATO 1:7 pistol length AR-15 barrels from
7 U.S. Company #1 and directed U.S. Company #1 to ship the items to
8 MNEIMNE's residence.

9 Overt Act No. 15: On August 8, 2019, defendant MNEIMNE
10 purchased four ELD Performance Alpha Series AR-15 7.5", Pistol Gas,
11 5.56 NATO, 1-7T Nitride Barrels and six United Defense AR-15
12 5.56/.223 Complete Bolt Carrier Groups from U.S. Company #4 and
13 directed U.S. Company #4 to ship the items to MNEIMNE's residence.

14 Overt Act No. 16: On August 11, 2019, defendant SHAIB sent
15 defendant MNEIMNE \$250 via Western Union.

16 Overt Act No. 17: On August 16, 2019, defendant MNEIMNE
17 purchased three 7.5" 5.56 NATO 1:7 pistol length AR-15 barrels from
18 U.S. Company #1 and directed U.S. Company #1 to ship the items to
19 MNEIMNE's residence.

20 Overt Act No. 18: On August 26, 2019, defendant SHAIB sent
21 defendant MNEIMNE \$720 via Western Union.

22 Overt Act No. 19: On October 3, 2019, defendant SHAIB sent
23 defendant MNEIMNE \$2000 via Western Union.

24 Overt Act No. 20: On October 8, 2019, defendant MNEIMNE
25 purchased ten U.S. Company #1 AR-15 .223/.223 Wylde/300acc
26 blackout/5.5 and one U.S. Company #1 thread protector 1/2 x 28 (9mm &
27 .357 SIG barrels) steel black from U.S. Company #1 and directed U.S.
28 Company #1 to ship the items to MNEIMNE's residence.

1 Overt Act No. 21: On October 8, 2019, defendant MNEIMNE
2 purchased five U.S. Company #2 4.75" 5.56 NATO SS 1:5 Twist barrels
3 from U.S. Company #2 and directed U.S. Company #2 to ship the items
4 to MNEIMNE's residence.

5 Overt Act No. 22: On October 8, 2019, defendant MNEIMNE
6 purchased one Glock OEM barrel 17, 19 & 34 - Gen 1-4 from U.S.
7 Company #13 and directed U.S. Company #13 to ship the item to
8 MNEIMNE's residence.

9 Overt Act No. 23: On October 8, 2019, defendant MNEIMNE
10 purchased one Killer Innovations CZP10C Threaded Velocity barrel from
11 U.S. Company #14 and directed U.S. Company #14 to ship the item to
12 MNEIMNE's residence.

13 Overt Act No. 24: On October 11, 2019, defendant MNEIMNE
14 purchased ten Precision Defense 5.56 Complete M16 bolt carrier groups
15 - nitride from U.S. Company #10 and directed U.S. Company #10 to ship
16 the items to MNEIMNE's residence.

17 Overt Act No. 25: On October 26, 2019, defendant SHAIB sent
18 defendant MNEIMNE \$375 via Western Union.

19 Overt Act No. 26: On November 5, 2019, defendant SHAIB sent
20 defendant MNEIMNE \$2415 via Western Union.

21 Overt Act No. 27: On November 5, 2019, defendant MNEIMNE
22 purchased twenty Bear Creek Arsenal 10.5", 5.56 NATO Parkerized 4150
23 carbine barrels from U.S. Company #10 and directed U.S. Company #10
24 to ship the items to MNEIMNE's residence.

25 Overt Act No. 28: On November 13, 2019, defendant MNEIMNE
26 purchased twenty Bear Creek Arsenal 10.5", 5.56 NATO Parkerized 4150
27 carbine barrels from U.S. Company #10 and directed U.S. Company #10
28 to ship the items to MNEIMNE's residence.

1 Overt Act No. 29: On November 14, 2019, defendant SHAIB
2 directed defendant MNEIMNE to purchase ten 7.5" 5.56 NATO 1:7 pistol
3 length AR-15 barrels from U.S. Company #1.

4 Overt Act No. 30: On November 15, 2019, defendant MNEIMNE
5 purchased ten 7.5" 5.56 NATO 1:7 pistol length AR-15 barrels from
6 U.S. Company #1 and directed U.S. Company #1 to ship the items to
7 MNEIMNE's residence.

8 Overt Act No. 31: On November 18, 2019, defendant SHAIB
9 directed defendant MNEIMNE to purchase five Glock OEM slide parts
10 kits for a Gen 3 9mm from U.S. Company #3 and ten Polymer80 - PF940C
11 pistol frame kits from U.S. Company #5.

12 Overt Act No. 32: On November 19, 2019, defendant MNEIMNE
13 purchased ten Polymer80 - PF940C pistol frame kits from U.S. Company
14 #5 and directed U.S. Company #5 to ship the items to MNEIMNE's
15 residence.

16 Overt Act No. 33: On November 21, 2019, defendant SHAIB
17 directed defendant MNEIMNE to purchase ten Recoil Technologies AR-15
18 5.56/.223/.300/.350 complete bolt carrier groups from U.S. Company
19 #9, as well as two 80% P320 compatible inserts - MUP 1 and two Sig
20 Sauer P320 lower parts kits from U.S. Company #11.

21 Overt Act No. 34: On November 23, 2019, defendant SHAIB sent
22 defendant MNEIMNE \$1065 via Western Union.

23 Overt Act No. 35: On November 23, 2019, defendant SHAIB
24 instructed defendant MNEIMNE to ship two packages to Beirut, Lebanon
25 using false names for the sender on both packages, and to falsely
26 state that the boxes contained items such as an "English dictionary,"
27 "coloring pens," "toys," and "playdoh."

1 Overt Act No. 36: On November 26, 2019, defendant SHAIB
2 directed defendant MNEIMNE to purchase ten Glock Factory customizable
3 frame parts kits for a Glock 19 Gen 3 9mm Luger and seven Glock
4 Factory slide parts kits for a Glock Gen 3 9mm Luger from U.S.
5 Company #8.

6 Overt Act No. 37: On November 28, 2019, defendant MNEIMNE
7 purchased ten Glock Factory customizable frame parts kits for a Glock
8 19 Gen 3 9mm Luger and seven Glock Factory slide parts kits for a
9 Glock Gen 3 9mm Luger from U.S. Company #8 and directed U.S. Company
10 #8 to ship the items to MNEIMNE's residence.

11 Overt Act No. 38: On November 29, 2019, defendant SHAIB
12 directed defendant MNEIMNE to purchase: (1) ten KAK VALUE LINE 5.56
13 4.75" melonite barrels from U.S. Company #2; (2) five ELD Performance
14 Match Grade 9mm Glock 19 compatible nitride melonite 1-16T threaded
15 barrels and five Bear Creek Arsenal stainless steel threaded barrels
16 for a Glock 17 from U.S. Company #4; (3) ten Recoil Technologies AR-
17 15 5.56/.223/.300/.350 complete bolt carrier groups from U.S. Company
18 #9; and (4) five Bear Creek Arsenal stainless steel threaded barrels
19 for a Glock 19 from U.S. Company #10.

20 Overt Act No. 39: On November 29, 2019, defendant SHAIB sent
21 defendant MNEIMNE \$2000 via Western Union.

22 Overt Act No. 40: On November 29, 2019, defendant SHAIB sent
23 defendant MNEIMNE \$470 via Western Union.

24 Overt Act No. 41: On December 1, 2019, defendant SHAIB sent
25 defendant MNEIMNE \$250 via Western Union.

26 Overt Act No. 42: On December 2, 2019, defendant SHAIB
27 directed defendant MNEIMNE to purchase five ELD Performance Match
28 Grade 9mm Glock 19 compatible nitride melonite 1-16T threaded barrels

1 from U.S. Company #4, and ten Recoil Technologies AR-15
2 5.56/.223/.300/.350 complete bolt carrier groups from U.S. Company
3 #9.

4 Overt Act No. 43: On December 7, 2019, defendant MNEIMNE
5 purchased ten KAK VALUE LINE 5.56 4.75" melonite barrels from U.S.
6 Company #2 and directed U.S. Company #2 to ship the items to the
7 Sherman Oaks address.

8 Overt Act No. 44: On December 10, 2019, defendant SHAIB
9 directed defendant MNEIMNE to purchase ten SAA AR-15/M16 - BCG MPI
10 Nitride, .2233/5.56/300AAC complete bolt carrier groups from U.S.
11 Company #6, and five HK MP5 3 Position 0, 1, F Navy Housing, Push Pin
12 Housings from U.S. Company #12.

13 Overt Act No. 45: On December 10, 2019, defendant MNEIMNE
14 purchased ten SAA AR-15/M16 - BCG MPI Nitride, .2233/5.56/300AAC
15 complete bolt carrier groups from U.S. Company #6 and directed U.S.
16 Company #6 to ship the items to MNEIMNE's residence.

17 Overt Act No. 46: On December 27, 2019, defendant SHAIB sent
18 defendant MNEIMNE \$240 via Western Union.

19 Overt Act No. 47: On January 18, 2020, defendant SHAIB sent
20 defendant MNEIMNE \$190 via Western Union.

21 Overt Act No. 48: On February 22, 2020, defendant SHAIB sent
22 defendant MNEIMNE \$360 via Western Union.

23 Overt Act No. 49: On February 22, 2020, defendant MNEIMNE
24 informed defendant SHAIB that defendant MNEIMNE was in line at
25 Western Union.

26 Overt Act No. 50: On February 24, 2020, defendant MNEIMNE
27 shipped a package that weighed 22.94 pounds that he claimed contained
28 a "gaming set, headphones, [and a] poker set" to Lebanese Company #1.

1 Overt Act No. 51: On March 11, 2020, defendant SHAIB sent
2 defendant MNEIMNE \$2200 via Western Union.

3 Overt Act No. 52: On April 4, 2020, defendant SHAIB instructed
4 defendant MNEIMNE to send a package to Lebanese Company #1, and to
5 state that the package contained a "Texas holdem poker game set,
6 first aid kit, scotch roller, LOL surprise swag, [and a] salt and
7 pepper grinder."

8 Overt Act No. 53: On April 6, 2020, defendant MNEIMNE shipped
9 a package that weighed 22.92 pounds that he claimed contained a "game
10 set, first aid kit, [and] scotch roll" to Lebanese Company #1.

11 Overt Act No. 54: On April 17, 2020, defendant SHAIB sent
12 defendant MNEIMNE \$2500 via Western Union.

13 Overt Act No. 55: On April 17, 2020, defendant SHAIB sent
14 defendant MNEIMNE \$200 via Western Union.

15 Overt Act No. 56: On April 27, 2020, defendant SHAIB sent
16 defendant MNEIMNE \$1350 via Western Union.

17 Overt Act No. 57: On May 2, 2020, defendant SHAIB sent
18 defendant MNEIMNE \$300 via Western Union.

COUNT TWO

[50 U.S.C. § 4819(a), (b);

15 C.F.R. §§ 736.2 and 764.2, and parts 738 and 742]

The Grand Jury incorporates Introductory Allegations 1 through 7 and 15 through 19 as if fully set forth herein.

A. OBJECT OF THE CONSPIRACY

Beginning no later than on or about March 10, 2020, and continuing until at least on or about May 20, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendants SHAIB and MNEIMNE, together with others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and willfully:

1. Attempt to export, export, and cause to export from the United States to Lebanon of items controlled on the CCL, without first having obtained a license or authorization from the DOC to do so, as required by the EAR, in violation of Title 50, United States Code, Section 4819; and

2. Engage in transactions and take other actions with the intent to evade the provisions of the EAR, in violation of Title 50, United States Code, Section 4819.

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished, in substance, as follows:

1. Defendant SHAIB would direct defendant MNEIMNE to purchase the Commodities from the U.S. Companies.

2. Defendant MNEIMNE would purchase the Commodities from the U.S. Companies and would direct the sellers to mail the Commodities

1 to locations in Los Angeles, California, including MNEIMNE's
2 residence.

3 3. Defendant MNEIMNE would export the Commodities to Lebanon
4 without obtaining the required export licenses.

5 4. Defendant SHAIB caused money to be transferred to defendant
6 MNEIMNE, including via Western Union to pay for the Commodities and
7 to compensate defendant MNEIMNE in exchange for his efforts.

8 C. OVERT ACTS

9 In furtherance of the conspiracy and to accomplish its objects,
10 on or about the following dates, defendants SHAIB, and MNEIMNE, and
11 others known and unknown to the Grand Jury committed various overt
12 acts in Los Angeles County, within the Central District of
13 California, and elsewhere, including, but not limited to, the
14 following:

15 Overt Act No. 1: On March 10, 2020, defendant SHAIB directed
16 defendant MNEIMNE to purchase twenty SAA AR-15/M16 - BCG MPI Nitride,
17 .2233/5.56/300AAC complete bolt carrier groups from U.S. Company #6.

18 Overt Act No. 2: On March 11, 2020, defendant SHAIB sent
19 defendant MNEIMNE \$2200 via Western Union.

20 Overt Act No. 3: On March 13, 2020, defendant MNEIMNE
21 purchased twenty SAA AR-15/M16 - BCG MPI Nitride, .2233/5.56/300AAC
22 complete bolt carrier groups from U.S. Company #6 and directed U.S.
23 Company #6 to ship the items to MNEIMNE's residence.

24 Overt Act No. 4: On April 4, 2020, defendant SHAIB instructed
25 defendant MNEIMNE to send a package to Lebanese Company #1, and to
26 state that the package contained a "Texas holdem poker game set,
27 first aid kit, scotch roller, LOL surprise swag, [and a] salt and
28 pepper grinder."

1 Overt Act No. 5: On April 6, 2020, defendant MNEIMNE shipped
2 a package that weighed 22.92 pounds that he claimed contained a "game
3 set, first aid kit, [and] scotch roll" to Lebanese Company #1.

4 Overt Act No. 6: On April 14, 2020, defendant SHAIB directed
5 defendant MNEIMNE to purchase twenty SAA AR-15/M16 - BCG MPI Nitride,
6 .2233/5.56/300AAC complete bolt carrier groups from U.S. Company #6.

7 Overt Act No. 7: On April 17, 2020, defendant SHAIB sent
8 defendant MNEIMNE \$2500 via Western Union.

9 Overt Act No. 8: On April 17, 2020, defendant SHAIB sent
10 defendant MNEIMNE \$200 via Western Union.

11 Overt Act No. 9: On April 25, 2020, defendant SHAIB
12 instructed defendant MNEIMNE to send a package to Lebanese Company
13 #1, and to state that the package contained "2 texas hold em with
14 chips 120\$."

15 Overt Act No. 10: On April 27, 2020, defendant SHAIB sent
16 defendant MNEIMNE \$1350 via Western Union.

17 Overt Act No. 11: On April 27, 2020, defendant MNEIMNE shipped
18 a package that weighed 10.99 pounds to Lebanese Company #1 that he
19 claimed contained "one gaming set," but actually contained eight M-16
20 bolt carrier groups: M-16 bolt carrier assemblies.

21 Overt Act No. 12: On April 30, 2020, defendant SHAIB directed
22 defendant MNEIMNE to purchase seven SAA AR-15/M16 - BCG MPI Nitride,
23 .2233/5.56/300AAC complete bolt carrier groups from U.S. Company #6.

24 Overt Act No. 13: On April 30, 2020, defendant MNEIMNE
25 purchased seven SAA AR-15/M16 - BCG MPI Nitride, .2233/5.56/300AAC
26 complete bolt carrier groups from U.S. Company #6 and directed U.S.
27 Company #6 to ship the items to MNEIMNE's residence.

1 Overt Act No. 14: On May 2, 2020, defendant SHAIB sent
2 defendant MNEIMNE \$300 via Western Union.

3 Overt Act No. 15: On May 20, 2020, defendant MNEIMNE purchased
4 seven SAA AR-15/M16 - BCG MPI Nitride, .2233/5.56/300AAC complete
5 bolt carrier groups from U.S. Company #6 and directed U.S. Company #6
6 to ship the items to MNEIMNE's residence.

COUNT THREE

[50 U.S.C. § 4819(a), (b);

15 C.F.R. §§ 736.2 and 764.2, and parts 738 and 742]

The Grand Jury incorporates Introductory Allegations 1 through 7 and 15 through 19 as if fully set forth herein.

On or about April 27, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendants SHAI B and MNEIMNE, aiding and abetting each other, knowingly and willfully attempted to export from the United States to Lebanon items controlled on the CCL, namely eight M-16 bolt carrier groups: M-16 bolt carrier assemblies, without first having obtained a license or authorization from the DOC to do so, as required by the EAR.

COUNT FOUR

[18 U.S.C. § 1956(a)(2)(A), (h)]

The Grand Jury incorporates Introductory Allegations 1 through 19 as if fully set forth herein.

A. OBJECT OF THE CONSPIRACY

Beginning no later than on or about March 20, 2019, and continuing until at least on or about May 20, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendants SHAIB and MNEIMNE, together with others known and unknown to the Grand Jury, conspired with each other to transport, transmit, and transfer a monetary instrument and funds to a place in the United States, specifically, Los Angeles, California, within the Central District of California, from or through a place outside the United States, specifically, Beirut, Lebanon, via Western Union with the intent to promote the carrying on of specified unlawful activity, specifically, violations of Title 22, United States Code, Sections 2778(b)(2), (c) (conspiracy to violate the AECA), and Title 18, United States Code, Section 554 (smuggling goods from the United States).

B. THE MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were to be accomplished, in substance, as follows:

1. Defendant SHAIB would direct defendant MNEIMNE to purchase the Defense Articles and the Commodities from the U.S. Companies.

2. Defendant MNEIMNE would purchase the Defense Articles and the Commodities from the U.S. Companies and would direct the sellers to mail the Defense Articles and the Commodities to locations in Los Angeles, California, including MNEIMNE's residence.

1 3. Defendant MNEIMNE would export the Defense Articles and the
2 Commodities to Lebanon without obtaining the required export
3 licenses.

4 4. Defendant SHAIB caused money to be transferred from Beirut,
5 Lebanon to defendant MNEIMNE in Los Angeles, California, including
6 via Western Union to pay for the Defense Articles and the Commodities
7 and to compensate defendant MNEIMNE in exchange for his efforts.

8 C. OVERT ACTS

9 In furtherance of the conspiracy and to accomplish its objects,
10 on or about the following dates, defendants SHAIB, and MNEIMNE, and
11 others known and unknown to the Grand Jury committed various overt
12 acts in Los Angeles County, within the Central District of
13 California, and elsewhere, including, but not limited to, the
14 following:

15 The Grand Jury incorporates Overt Acts 1 through 57 in Section C
16 of Count One and Overt Acts 1 through 15 in Section C of Count Two of
17 this Indictment here.

COUNT FIVE

[18 U.S.C. § 371: Conspiracy]

The Grand Jury incorporates Introductory Allegations 1 through 19 as if fully set forth herein.

A. OBJECT OF THE CONSPIRACY

Beginning no later than on or about March 20, 2019, and continuing until at least on or about May 20, 2020, in Los Angeles County, within the Central District of California, and elsewhere, defendants SHAIB and MNEIMNE, together with others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to fraudulently and knowingly send and export from the United States merchandise, articles, and objects contrary to a law and regulation of the United States contrary to Title 18, United States Code, Section 554 (smuggling goods from the United States).

B. THE MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were to be accomplished, in substance, as follows:

1. Defendant SHAIB would direct defendant MNEIMNE to purchase the Defense Articles and the Commodities from the U.S. Companies.

2. Defendant MNEIMNE would purchase the Defense Articles and the Commodities from the U.S. Companies and would direct the sellers to mail the Defense Articles and the Commodities to locations in Los Angeles, California, including MNEIMNE's residence.

3. Defendant MNEIMNE would export the Defense Articles and the Commodities to Lebanon without obtaining the required export licenses.

4. Defendant SHAIB caused money to be transferred from Beirut, Lebanon to defendant MNEIMNE in Los Angeles, California, including

1 via Western Union to pay for the Defense Articles and the Commodities
2 and to compensate defendant MNEIMNE in exchange for his efforts.

3 C. OVERT ACTS

4 In furtherance of the conspiracy and to accomplish its objects,
5 on or about the following dates, defendants SHAIB, and MNEIMNE, and
6 others known and unknown to the Grand Jury committed various overt
7 acts in Los Angeles County, within the Central District of
8 California, and elsewhere, including, but not limited to, the
9 following:

10 Overt Act No. 1: On November 21, 2019, defendant SHAIB
11 directed defendant MNEIMNE to purchase ten Recoil Technologies AR-15
12 5.56/.223/.300/.350 complete bolt carrier groups from U.S. Company
13 #9, as well as two 80% P320 compatible inserts - MUP 1 and two Sig
14 Sauer P320 lower parts kits from U.S. Company #11.

15 Overt Act No. 2: On November 23, 2019, defendant SHAIB sent
16 defendant MNEIMNE \$1065 via Western Union.

17 Overt Act No. 3: On November 23, 2019, defendant SHAIB
18 instructed defendant MNEIMNE to ship two packages to Beirut, Lebanon
19 using false names for the sender on both packages, and to falsely
20 state that the boxes contained items such as an "English dictionary,"
21 "coloring pens," "toys," and "playdoh."

22 Overt Act No. 4: On November 26, 2019, defendant SHAIB
23 directed defendant MNEIMNE to purchase ten Glock Factory customizable
24 frame parts kits for a Glock 19 Gen 3 9mm Luger and seven Glock
25 Factory slide parts kits for a Glock Gen 3 9mm Luger from U.S.
26 Company #8.

27 Overt Act No. 5: On November 28, 2019, defendant MNEIMNE
28 purchased ten Glock Factory customizable frame parts kits for a Glock

1 19 Gen 3 9mm Luger and seven Glock Factory slide parts kits for a
2 Glock Gen 3 9mm Luger from U.S. Company #8 and directed U.S. Company
3 #8 to ship the items to MNEIMNE's residence.

4 Overt Act No. 6: On November 29, 2019, defendant SHAIB
5 directed defendant MNEIMNE to purchase: (1) ten KAK VALUE LINE 5.56
6 4.75" melonite barrels from U.S. Company #2; (2) five ELD Performance
7 Match Grade 9mm Glock 19 compatible nitride melonite 1-16T threaded
8 barrels and five Bear Creek Arsenal stainless steel threaded barrels
9 for a Glock 17 from U.S. Company #4; (3) ten Recoil Technologies AR-
10 15 5.56/.223/.300/.350 complete bolt carrier groups from U.S. Company
11 #9; and (4) five Bear Creek Arsenal stainless steel threaded barrels
12 for a Glock 19 from U.S. Company #10.

13 Overt Act No. 7: On November 29, 2019, defendant SHAIB sent
14 defendant MNEIMNE \$2000 via Western Union.

15 Overt Act No. 8: On November 29, 2019, defendant SHAIB sent
16 defendant MNEIMNE \$470 via Western Union.

17 Overt Act No. 9: On December 1, 2019, defendant SHAIB sent
18 defendant MNEIMNE \$250 via Western Union.

19 Overt Act No. 10: On December 2, 2019, defendant SHAIB
20 directed defendant MNEIMNE to purchase five ELD Performance Match
21 Grade 9mm Glock 19 compatible nitride melonite 1-16T threaded barrels
22 from U.S. Company #4, and ten Recoil Technologies AR-15
23 5.56/.223/.300/.350 complete bolt carrier groups from U.S. Company
24 #9.

25 Overt Act No. 11: On December 10, 2019, defendant SHAIB
26 directed defendant MNEIMNE to purchase ten SAA AR-15/M16 - BCG MPI
27 Nitride, .2233/5.56/300AAC complete bolt carrier groups from U.S.
28

1 Company #6, and five HK MP5 3 Position 0, 1, F Navy Housing, Push Pin
2 Housings from U.S. Company #12.

3 Overt Act No. 12: On December 10, 2019, defendant MNEIMNE
4 purchased ten SAA AR-15/M16 - BCG MPI Nitride, .2233/5.56/300AAC
5 complete bolt carrier groups from U.S. Company #6 and directed U.S.
6 Company #6 to ship the items to MNEIMNE's residence.

7 Overt Act No. 13: On December 27, 2019, defendant SHAIB sent
8 defendant MNEIMNE \$240 via Western Union.

9 Overt Act No. 14: On January 18, 2020, defendant SHAIB sent
10 defendant MNEIMNE \$190 via Western Union.

11 Overt Act No. 15: On February 22, 2020, defendant SHAIB sent
12 defendant MNEIMNE \$360 via Western Union.

13 Overt Act No. 16: On February 22, 2020, defendant MNEIMNE
14 informed defendant SHAIB that defendant MNEIMNE was in line at
15 Western Union.

16 Overt Act No. 17: On February 24, 2020, defendant MNEIMNE
17 shipped a package that weighed 22.94 pounds that he claimed contained
18 a "gaming set, headphones, [and a] poker set" to Lebanese Company #1.

19 Overt Act No. 18: On March 10, 2020, defendant SHAIB directed
20 defendant MNEIMNE to purchase twenty SAA AR-15/M16 - BCG MPI Nitride,
21 .2233/5.56/300AAC complete bolt carrier groups from U.S. Company #6.

22 Overt Act No. 19: On March 11, 2020, defendant SHAIB sent
23 defendant MNEIMNE \$2200 via Western Union.

24 Overt Act No. 20: On March 13, 2020, defendant MNEIMNE
25 purchased twenty SAA AR-15/M16 - BCG MPI Nitride, .2233/5.56/300AAC
26 complete bolt carrier groups from U.S. Company #6 and directed U.S.
27 Company #6 to ship the items to MNEIMNE's residence.

1 Overt Act No. 21: On April 4, 2020, defendant SHAIB instructed
2 defendant MNEIMNE to send a package to Lebanese Company #1, and to
3 state that the package contained a "Texas holdem poker game set,
4 first aid kit, scotch roller, LOL surprise swag, [and a] salt and
5 pepper grinder."

6 Overt Act No. 22: On April 6, 2020, defendant MNEIMNE shipped
7 a package that weighed 22.92 pounds that he claimed contained a "game
8 set, first aid kit, [and] scotch roll" to Lebanese Company #1.

9 Overt Act No. 23: On April 30, 2020, defendant SHAIB directed
10 defendant MNEIMNE to purchase seven SAA AR-15/M16 - BCG MPI Nitride,
11 .2233/5.56/300AAC complete bolt carrier groups from U.S. Company #6.

12 Overt Act No. 24: On April 30, 2020, defendant MNEIMNE
13 purchased seven SAA AR-15/M16 - BCG MPI Nitride, .2233/5.56/300AAC
14 complete bolt carrier groups from U.S. Company #6 and directed U.S.
15 Company #6 to ship the items to MNEIMNE's residence.

16 Overt Act No. 25: On May 2, 2020, defendant SHAIB sent
17 defendant MNEIMNE \$300 via Western Union.

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Overt Act No. 26: On May 20, 2020, defendant MNEIMNE purchased seven SAA AR-15/M16 - BCG MPI Nitride, .2233/5.56/300AAC complete bolt carrier groups from U.S. Company #6 and directed U.S. Company #6 to ship the items to MNEIMNE's residence.

A TRUE BILL

/S/

Foreperson

STEPHANIE S. CHRISTENSEN
Acting United States Attorney


CHRISTOPHER D. GRIGG
Assistant United States Attorney
Chief, National Security Division

REEMA M. EL-AMAMY
Assistant United States Attorney
Terrorism and Export Crimes
Section